

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' EIGHTY-THIRD (SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN DUPLICATE  
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the eighty-third omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.

4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an

admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

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The Honorable John T. Dorsey  
Chief United States Bankruptcy Judge

**SCHEDULE 1**

**Duplicate Portal Claims**

Undetermined\*: Indicates claim contains unliquidated and/or undetermined amounts

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
							SOL-PERP		0.0000000000000028
							SPILL		84.4100000000000000
							SRM		0.5177788000000000
							SRM_LOCKED		4.8298464000000000
							STEP-PERP		0.0000000000000000
							SUSHI		0.7554000000000000
							TRU-PERP		0.0000000000000000
							USD		166,456.68848555000000
							USDT		0.000000000427053
							USTC-PERP		0.0000000000000000
							WAVES-PERP		0.0000000000000000
							WBTC		0.1059092800000000
							ZIL-PERP		0.0000000000000000
Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.									
27839	Name on file	FTX Trading Ltd.	BTC	0.4735000000000000	22892*	Name on file	FTX Trading Ltd.	BTC	0.4735000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).									
480	Name on file	FTX Trading Ltd.	USD	10,607.0000000000000000	437	Name on file	FTX Trading Ltd.	USD	110,386.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.									
43529	Name on file	FTX Trading Ltd.			12204	Name on file	FTX Trading Ltd.		
		AAVE-PERP		0.0000000000000000			AAVE-PERP		0.0000000000000000
		ADA-PERP		0.0000000000000000			ADA-PERP		0.0000000000000000
		AGLD-PERP		0.0000000000000000			AGLD-PERP		0.0000000000000000
		AR-PERP		0.0000000000000000			AR-PERP		0.0000000000000000
		ATOM-PERP		0.0000000000000000			ATOM-PERP		0.0000000000000000
		AVAX-PERP		0.0000000000000000			AVAX-PERP		0.0000000000000000
		AXS-PERP		0.00000000000000028			AXS-PERP		0.00000000000000028
		DOGE-PERP		0.0000000000000000			DOGE-PERP		0.0000000000000000
		DYDX-PERP		-0.0000000000000028			DYDX-PERP		-0.0000000000000028
		ETH		1.5784777800000000			ETH		1.5784777800000000
		ETH-PERP		0.0000000000000000			ETH-PERP		0.0000000000000000
		ETHW		1.5784777800000000			ETHW		1.5784777800000000
		FTM-PERP		0.0000000000000000			FTM-PERP		0.0000000000000000
		FTT		0.0950125000000000			FTT		0.0950125000000000
		LUNA2		0.000921549463400			LUNA2		0.000921549463400
		LUNA2_LOCKED		0.002158615415000			LUNA2_LOCKED		0.002158615415000
		LUNC-PERP		0.0000000000000000			LUNC-PERP		0.0000000000000000
		MATIC-PERP		0.0000000000000000			MATIC-PERP		0.0000000000000000
		OMG-PERP		0.0000000000000000			OMG-PERP		0.0000000000000000
		ONE-PERP		0.0000000000000000			ONE-PERP		0.0000000000000000
		OP-PERP		0.0000000000000000			OP-PERP		0.0000000000000000
		RAY-PERP		0.0000000000000000			RAY-PERP		0.0000000000000000
		RUNE-PERP		0.0000000000000000			RUNE-PERP		0.0000000000000000
		SHB-PERP		0.0000000000000000			SHB-PERP		0.0000000000000000
		SJP-PERP		0.0000000000000000			SJP-PERP		0.0000000000000000
		SOL-PERP		0.0000000000000003			SOL-PERP		0.0000000000000003
		SUSHI-PERP		0.0000000000000000			SUSHI-PERP		0.0000000000000000
		TRX		0.0000010000000000			TRX		0.0000010000000000
		USD		21,915.400780961755000			USD		21,915.400780961755000
		USDT		0.0000000000000000			USDT		0.0000000000000000
		USTC		0.1310160000000000			USTC		0.1310160000000000
		XTZ-PERP		0.0000000000000000			XTZ-PERP		0.0000000000000000
		YFI-PERP		0.0000000000000000			YFI-PERP		0.0000000000000000
Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.									

22892\*: Surviving Claim was ordered modified on the Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)